

**AMENDMENTS TO THE DRAWINGS**

Please amend the figures as shown in the enclosed replacement sheets. The attached sheet(s) of drawings includes changes to Figures 4 and 5 to indicate "Prior Art." Applicant submits that these replacement figures are formal.

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

**Disposition of Claims**

Claims 1-6 are pending in this application. Claims 1, 2, and 5 are independent. The remaining claims depend, directly or indirectly, from claims 2 or 5.

**Objection(s)**

**Oath/Declaration**

The Examiner asserts that the declaration is defective because the specification to which the declaration is directed has not been adequately identified. However, Applicant respectfully asserts that the declaration is not defective. The Specification to which the declaration is directed has been identified as "MULTIPLE CONTROL SYSTEM" at the time the declaration was filed with the Specification (*see* Declaration, page 1). *See* 37 CFR 1.63(b)(1). A copy of the declaration is attached for the Examiner's convenience. Accordingly, withdrawal of the objection to the oath/declaration is respectfully requested

**Drawings**

Figures 4 and 5 were objected to for not designating a legend such as "Prior Art." By way of this reply, Figures 4 and 5 have been amended to indicate "Prior Art." Accordingly, withdrawal of the objection to the drawings is respectfully requested.

Title

The title of the invention is objected to for not being descriptive. The title has been amended in this reply to "CONTROL SYSTEM FOR ELECTRONIC DEVICES AND A DISPLAY DEVICE." Applicant thanks the Examiner for the suggested title, and respectfully asserts that as amended, the title of the invention is clearly indicative of the invention to which the claims are directed. Accordingly, withdrawal of the objection to the title is respectfully requested.

**Rejection(s) under 35 U.S.C. § 103**Claims 1-5

Claims 1-5 are rejected under 35 U.S.C. § 103(a) as being obvious over Japanese Patent Application Publication No. 05-265389 (hereinafter "Saegusa") in view of Japanese Patent Application Publication No. 08-088838 (hereinafter "Masaki"), and further in view of U.S. Patent No. 5,801,674 issued to Shimizu (hereinafter "Shimizu"). For the reasons set forth below, this rejection is respectfully traversed.

The present invention is directed to a first controller and a second controller for controlling corresponding electronic devices and a display driver. As seen with respect to Figure 1 of the Specification, a multiple control system (10) in accordance with one or more embodiments of the invention comprises, in part, a first controller (VCR microcomputer) (1), a second controller (DVD microcomputer) (2), a display driver (3), and a display unit (4) (*see, e.g.,* publication of the Specification, Figure 1, paragraph [0036]). As seen with respect to Figure 1, a chip selection terminal, a serial output terminal, and a clock terminal of each of the first controller (1) and the second controller (2) are connected to a chip selection terminal, a

serial output terminal, and a clock terminal, respectively, of the display driver (driver IC) (3) (*see, e.g.*, publication of the Specification, paragraph [0037]).

In one or more embodiments of the invention, when a VCR mode is selected, the VCR microcomputer (1) sends a VCR mode selection signal to the output selection terminal (D-SEL) of the DVD microcomputer (2). The DVD microcomputer (2) then puts the output terminals to the driver IC (3) in a high impedance state (*see, e.g.*, publication of the Specification, paragraphs [0041]-[0042]).

Accordingly, independent claims 1 and 2 require that when the first controller controls the display driver, the first controller outputs a first control signal to the second controller, and the second controller puts the three-state output terminal thereof in a high impedance state when the first control signal is received. Independent claim 5 requires that the first microcomputer and the second microcomputer are connected such that the second microcomputer receives a mode selection signal output from the first microcomputer, and when the first microcomputer determines that the recording and reproducing functional part is selected, the first microcomputer outputs the mode selection signal indicating that the recording and reproducing functional part is selected to the second microcomputer so as to put the three-state output terminal of the second microcomputer in a high impedance state, and outputs the display data to the display driver.

Saegusa, in contrast to the present invention, does not show or suggest at least the above limitations of the claimed invention. Saegusa fails to show or suggest at least that the first control signal for changing the state of the three-state output terminal of the second controller is output from the first controller. This fact is acknowledged by the Examiner (*see* Office Action dated November 17, 2005, at page 3). Accordingly, it would be clear to one skilled in the art that Saegusa fails to show or suggest at least the above limitations of the claimed invention.

Further, Applicant respectfully asserts that although the Examiner asserts that it would have obvious to combine the input actuation section with the first microprocessor, without the present invention as a guide, one skilled in the art would have no motivation to do so. Further, while the Examiner asserts that making integral that which is separate does not make an invention patentable, the combination proposed by the Examiner would render inoperable the input actuation section (7) of Saegusa, which as described in Saegusa, “performs encoding processing based on an actuation key input of a user, and shows the actuation input section which supplies actuation information to the radio control section (3) and the CD control section (4). The input actuation section (7) to encode a user input and send this information to either the radio control section (3) or the CD control section (4), must necessarily be separate from either control section. “The proposed modification cannot render the prior art unsatisfactory for its intended purpose.” See MPEP 4143.01. In contrast, the present invention allows one of a plurality of microcomputers connected in parallel to control which microcomputer controls a display element.

Masaki, as discussed above with reference to Saegusa, does not show or suggest at least the above limitations of independent claims 1, 2, or 5. Further, Masaki fails to show or suggest that which Saegusa lacks. The Examiner asserts that Masaki teaches the use of three-state output terminals for use where three video signals feed the same output (*see* Office Action dated November 17, 2005, at page 4). However, it would be clear to one skilled in the art that Masaki teaches an external input, input through the input terminal (4), for changing the state in the controllers (8, 9, 10) (*see* Masaki, Figure 1, paragraph [0020]). Thus, Masaki fails to teach at least a first controller outputting a first control signal to a second controller, and the second controller putting the three-state output terminal thereof in a high impedance state when the first control signal is received.

Thus, it would be clear to one skilled in the art that Masaki does not show or suggest at least that the first controller outputs a first control signal to the second controller, and the second controller puts the three-state output terminal thereof in a high impedance state when the first control signal is received.

Shimizu, like Masaki and Saegusa, does not show or suggest at least the above limitations of independent claims 1, 2, or 5. Further, Shimizu fails to show or suggest that which Saegusa and Masaki lack. This is evidenced by the fact that Shimizu is relied on only in an attempt to render obvious claim limitations relating to a display driver (3) for driving a display unit (1) (*see* Office Action dated November 17, 2005, at page 4). Shimizu is completely silent with respect to a first controller and a second controller connected to a display driver. Thus, it would be clear to one skilled in the art that Shimizu necessarily cannot show or suggest at least that when the first controller controls the display driver, the first controller outputs a first control signal to the second controller, and the second controller puts the three-state output terminal thereof in a high impedance state when the first control signal is received, as required by the claimed invention.

Further, Applicant notes that there is no motivation to combine the cited references. The Examiner cannot combine prior art references to render a claimed invention obvious by merely showing that all the limitations of the claimed invention can be found in the prior art references. There must be a suggestion or motivation to combine the references within the prior art references themselves. In other words, regardless of whether prior art references can be combined, there must be an indication within the prior art references expressing desirability to combine the references. *In re Mills*, 916 F.2d 680 (Fed. Cir. 1990) (emphasis added). Further, the present application *cannot be used as a guide* in reconstructing elements of prior art

references to render the claimed invention obvious. *In re Vaeck*, 947 F.2d 488 (Fed. Cir. 1991) (emphasis added).

One skilled in the art would not be motivated by Saegusa, which is directed to controlling a liquid-crystal display in an electronic device, to incorporate the teachings of Masaki, which is directed to memory sharing in a television receiver that capable of receiving multiple broadcast types, without the present application as a guide. Saegusa is completely silent with respect to three-state outputs, and thus provides no motivation to use three-state outputs. Masaki is completely silent with respect to controlling a liquid-crystal display, and thus provides no motivation to use or control a liquid-crystal display. Thus, one skilled in the art would not be motivated by Saegusa to incorporate the teaching of Masaki, and further would not be motivated by Masaki to incorporate the teachings of Saegusa, without the present application as a guide. Thus, there is no motivation to combine the cited references.

In view of the above, Saegusa, Masaki, and Shimizu, (i) whether taken separately or in combination, fail to show or suggest the invention as recited in independent claims 1, 2, or 5, and (ii) are not properly combinable. Thus, independent claims 1, 2, and 5 are patentable over Saegusa, Masaki, and Shimizu. Claims 3 and 4, directly or indirectly dependent from claim 2, are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

#### Claim 6

Claim 6 is rejected under 35 U.S.C. § 103(a) as being obvious over Saegusa in view of Masaki, further in view of Shimizu, and further in view of U.S. Patent No. 5,638,346 issued to Aramaki (hereinafter "Aramaki"). For the reasons set forth below, this rejection is respectfully traversed.

As discussed above, the present invention is directed to a first controller and a second controller for controlling corresponding electronic devices and a display driver. Independent claim 5 requires that the first microcomputer and the second microcomputer are connected such that the second microcomputer receives a mode selection signal output from the first microcomputer, and when the first microcomputer determines that the recording and reproducing functional part is selected, the first microcomputer outputs the mode selection signal indicating that the recording and reproducing functional part is selected to the second microcomputer so as to put the three-state output terminal of the second microcomputer in a high impedance state, and outputs the display data to the display driver.

As discussed above, Saegusa, Masaki, and Shimizu do not show or suggest all of the limitations of the claimed invention. Aramaki, like Saegusa, Masaki, and Shimizu, does not show or suggest all of the limitations of the claimed invention. Further, Aramaki fails to show or suggest that which Saegusa, Masaki, and Shimizu lack. This is evidenced by the fact that Aramaki is relied on only in an attempt to render obvious limitations related to a remote control signal receiving part. In contrast to the claimed invention, Aramaki is directed to a CD player having a jog dial track number selector (*see* Aramaki, Abstract). Aramaki is completely silent with respect to a first controller and a second controller connected to a display driver, as required by the claimed invention. Thus, it would be clear to one skilled in the art that Aramaki does not show or suggest at least a second microcomputer receiving a mode selection signal output from a first microcomputer. Further, it would be clear to one skilled in the art that Aramaki does not show or suggest at least that when the first microcomputer determines that the recording and reproducing functional part is selected, the first microcomputer outputs the mode selection signal indicating that the recording and reproducing functional part is selected to the second

microcomputer so as to put the three-state output terminal of the second microcomputer in a high impedance state, and outputs the display data to the display driver.

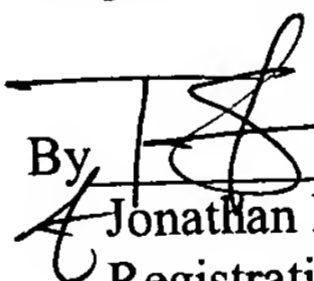
In view of the above, Saegusa, Masaki, Shimizu, and Aramaki, whether taken separately or in combination, fail to show or suggest the invention as recited in independent claim 5. Thus, independent claim 5 is patentable over Saegusa, Masaki, and Shimizu. Claim 6, directly or indirectly dependent from claim 5, is allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

### Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 04995/105001).

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Respectfully submitted,

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Attachments (copy of Declaration as filed with application)  
(Amended Figures 4 and 5)